

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION	No. 2:12-md-02323-AB MDL No. 2323
Kevin Turner and Shawn Wooden, <i>on behalf of themselves and others similarly situated,</i> Plaintiffs, v. National Football League and NFL Properties, LLC, <i>successor-in-interest to NFL Properties, Inc.,</i> Defendants.	No. 14-cv-00029-AB
THIS DOCUMENT RELATES TO: <i>Hernandez v. National Football League, et al.</i> <i>Scroggins, et al. v. National Football League</i>	No. 18-cv-00464 No. 16-cv-02058

**MOTION TO DISMISS THE COMPLAINTS FILED BY SETTLEMENT CLASS
MEMBERS TRACY SCROGGINS, ROSE STABLER, AND A.H.**

Defendants the National Football League ("NFL"), NFL Properties LLC ("NFLP"), and the NFL Foundation f/k/a NFL Charities ("NFLC" and, together with the NFL and NFLP, the "NFL Defendants") move to dismiss, with prejudice, the Complaints filed by Settlement Class Members Tracy Scroggins, Rose Stabler, and A.H. In support of this motion, the NFL Defendants rely on the points and authorities in the accompanying

memorandum of law, which the NFL Defendants submit herewith and incorporate herein in its entirety.

The NFL Defendants respectfully request oral argument on this motion.

Dated: August 17, 2018

/s/ Brad S. Karp
Brad S. Karp
Bruce Birenboim
Lynn B. Bayard
PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019-6064
Main: 212.373.3000
Fax: 212.757.3990
bkarp@paulweiss.com
bbirenboim@paulweiss.com
lbayard@paulweiss.com

*Attorneys for the National Football
League, NFL Properties LLC, and the
National Football League Foundation*

CERTIFICATE OF SERVICE

I, Brad S. Karp, hereby certify that on August 17, 2018, I caused a true and correct redacted copy of the MOTION TO DISMISS THE COMPLAINTS FILED BY SETTLEMENT CLASS MEMBERS TRACY SCROGGINS, ROSE STABLER, AND A.H., and accompanying memorandum of law, to be filed via CM/ECF, which caused notice to be sent to all counsel of record. In addition, I caused a true and correct redacted copy to be served on the following via FedEx:

George J. Leontire, Esq.
THE BAEZ LAW FIRM
6 Beacon St. Suite 510
Boston, MA 02108
Telephone: (855) 233-9080
Facsimile: (508) 207-9747
Attorneys for Plaintiff A.H.

I further certify that on August 17, 2018, I caused a true and correct unredacted copy of the MOTION TO DISMISS THE COMPLAINTS FILED BY SETTLEMENT CLASS MEMBERS TRACY SCROGGINS, ROSE STABLER, AND A.H., and accompanying memorandum of law, to be filed with the Court. In addition, I caused a true and correct unredacted copy to be served via FedEx on counsel for Plaintiff Tracy Scroggins at the following address:

Tim Howard, J.D., Ph.D
HOWARD & ASSOCIATES, P.A.
2120 Killarney Way, Suite 125
Tallahassee, FL 32309
Telephone: (850) 298-4455
Fax: (850) 216-2537
Attorneys for Plaintiff Tracy Scroggins

Dated: August 17, 2018

/s/ Brad S. Karp
Brad S. Karp